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Electronically Filed on Jan. 27, 2011

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re: DAVID RAMIREZ-LOPEZ and MARGARITA RAMIREZ Debtors.	Case No. 10-24215 LBR Date: February 3, 2011 Time: 1:30 p.m. Chapter 13

OBJECTION TO CONFIRMATION

COMES NOW, WELLS FARGO BANK (hereinafter "Secured Creditor") and files this OBJECTION TO CONFIRMATION stating as follows:

Secured Creditor is the first deed of trust holder on 3501 Purdue Way, Las Vegas, Nevada (hereinafter "subject property"), and is owed over $60,000.00 as listed in Debtors' schedule "A".

The docket states that the Debtors recently obtained an order valuing the subject property at $35,000. (#31).

The Debtors can not confirm a plan in their current financial situation and without making a proper and timely disclosure to the Court and creditors of the same.

The Court should consider;

a. The Debtors have been in bankruptcy for six (6) months without confirming a plan and the have benefited from the use of cash collateroll in the form of rents from the subject property.

b. Their schedule "G" does not list any leases of the rental property they own.

c. Their schedule "J" does not provide for the taxes, insurance, or maintenance expenses of the rental property.

d. Schedule "J" shows only an net income of $380.00 per month yet the proposed plan payments jump to $520 in August 2011.

e. The escalated payments are prohibited by 11 USC 1325(a)(5)(B)(iii)(I) in that they are not "equal monthly payemnts." See also In re Nichols, 40 F.3d 850 (6th Cir.), In re Schultz, 363 B.R. 902 , 906 (Bankr. E.D.Wis. 2007).

f. The Debtors can not substantiate the increase in income for August 2011.

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g. The proposed plan #1 does not provide for any treatment of this Secured Creditor's claim. Even assuming that the claim were allowed at $35,000, this Debtor's net income of $380 per month is not enough to pay the entire $35,000 through the plan over a sixty month period. This lack of feasibility becomes even more apparent if the Debtors were to try and add in the necessary costs of insurance, maintenance, and property taxes.

WHEREFORE, Secured Creditor asks that this Court deny confirmation and dismiss the case.

DATED this 27 day of January, 2011.

WILDE & ASSOCIATES

By /S/GREGORY L. WILDE
GREGORY L. WILDE, ESQ.
Attorneys for Secured Creditor

Certificate of Facsimile

I certify that on January 27, 2011, I served a copy of the foregoing opposition on Debtors' Counsel by facsimile as follows:

David M. Crosby
CROSBY & ASSOCIATES
Fax No. 702-382-1921

[signature]
Employee of Wilde & Associates

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*** TX REPORT ***
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